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# Comment Summary Report

Comments on the 2014 Draft Resource Management  
Plan/Environmental Impact Statement



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# COMMENTS ON THE 2014 DRAFT RESOURCE MANAGEMENT PLAN/ENVIRONMENTAL IMPACT STATEMENT

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## S.1 INTRODUCTION

After publishing the Draft RMP/EIS on October 10, 2014, the BLM twice extended the initial 90-day public comment period to receive comments on the Draft RMP/EIS; each extension added another 30 days. After these extensions, the public comment period officially ended March 9, 2015, for a total of 150 days for public review. The BLM received written comments by mail, fax, e-mail, and by verbal testimony at the public meetings.

Comments covered a wide spectrum of thoughts, opinions, ideas, and concerns. The BLM recognizes that commenters invested considerable time and effort to submit comments on the Draft RMP/EIS. As such, the agency developed a comment analysis method to ensure that all comments were considered, as directed by NEPA regulations. This systematic process ensured that all substantive comments were tracked.

On receipt, each comment letter was assigned an identification number and logged into a database that allowed the BLM to organize and categorize the comment submissions. Substantive comments from each letter were coded to appropriate categories, based on content, and the link to the commenter was retained. The categories generally followed the sections presented in the Draft RMP/EIS, though others were added and related to the planning process or editorial concerns.

Similar comments were grouped under a topic heading; the BLM then drafted a statement summarizing the issues contained in each group of comments.

Although the BLM diligently considered each comment letter, the comment analysis process involved determining if a comment was substantive. In performing this analysis, the BLM relied on CEQ regulations to determine what constituted a substantive comment, which has one or more of the following:

- Questions, with a reasonable basis, the adequacy of the information or analysis in the Draft RMP/EIS
- Presents reasonable alternatives, other than those in the Draft RMP/EIS, that meet the purpose and need of the Proposed Action and address significant issues
- Questions, with a reasonable basis, the merits of an alternative or alternatives
- Causes changes in or revisions to the Proposed Action

- Questions, with a reasonable basis, the adequacy of the planning process itself

Additionally, the BLM's NEPA handbook identifies the following types of substantive comments:

- Comments on the Adequacy of the Analysis—Comments that express a professional disagreement with the conclusions of the analysis or assert that the analysis is inadequate are considered substantive; they may or may not lead to changes in the Revised RMP/EIS.

Interpretations of analyses should be based on professional expertise. Where there is disagreement within a professional discipline, a careful review of the various interpretations is warranted. In some cases, public comments may necessitate a reevaluation of analytical conclusions. If, after reevaluation, the BLM Authorized Officer responsible for preparing the Draft RMP/EIS does not think that a change is warranted, the BLM's response should provide the rationale for that conclusion.

- Comments That Identify New Impacts, Alternatives, or Mitigation Measures—Public comments on the Draft RMP/EIS that identify impacts, alternatives, or mitigation measures that were not addressed in the draft are considered substantive. This type of comment requires the BLM Authorized Officer to determine if it warrants further consideration; if so, he or she must determine if the new impacts, new alternatives, or new mitigation measures should be analyzed in the Proposed RMP/Final EIS, in a supplement to the Draft RMP/EIS, or in a completely revised and recirculated Draft RMP/EIS.

- Disagreements with Significance Determinations—Comments that directly or indirectly question, with a reasonable basis, determinations on the significance or severity of impacts are considered substantive. A reevaluation of these determinations may be warranted and may lead to changes in the Final EIS. If, after reevaluation, the BLM Authorized Officer does not think that a change is warranted, the BLM's response should provide the rationale for that conclusion.

Comments that failed to meet the above description were considered non-substantive. Many commenters expressed personal opinions or preferences, their comments had little relevance to the adequacy or accuracy of the Draft RMP/EIS, or they commented on resource management that is outside the scope of the planning process. These commenters did not provide specific information to assist the planning team in making a change to the Preferred Alternative, did not suggest other alternatives, and did not take issue with methods used in the Draft RMP/EIS. These comments are not addressed further in this document.

Examples of these comments are the following:

- “The best of the alternatives is Alternative 4 (or 1, 2, or 3).”
- “Your plan does not reflect balanced land management.”
- “More land should be protected as wilderness.”
- “I want the EIS to reflect the following for this area: no grazing, no mining, and no OHVs.”
- “BLM should protect all ACECs/Wild and Scenic Rivers/areas with wilderness characteristics.”
- “Do not add any more road closures to what is now in existence.”
- “More areas should be made available for multiple uses (e.g., mining, OHVs, and ROWs) without severe restrictions.”

The BLM read, analyzed, and considered comments of a personal or philosophical nature and all opinions, feelings, and preferences for one element or one alternative over another.

It is also important to note that, while the BLM reviewed and considered all comments, none were counted as votes. The NEPA public comment period is neither an election, nor does it result in a representative sampling of the population. Therefore, public comments are not appropriate to be used as a democratic decision-making tool or as a scientific sampling mechanism.

Comments citing editorial changes to the document were reviewed and will be incorporated into development of the Revised Draft RMP/EIS. The Revised Draft RMP/EIS will be extensively technically edited and revised to fix typographical errors, missing references, definitions, and acronyms and provides other clarifications as needed.

#### **S.1.1 Campaign/Form Letters**

Several organizations and groups held standardized letter campaigns to submit comments during the public comment period for Draft RMP/EIS. Through this process, their constituents were able to submit the standard letter, or a modified version of the letter, indicating support for the group’s position on the BLM management actions. Individuals who submitted a modified standard letter generally added new comments or information to the letter or edited it to reflect their main concerns.

Modified letters with unique comments were given their own submission number and were coded appropriately. All commenters who used an organization’s campaign letter were tracked in the BLM commenter list and are available from the BLM on request.

#### **S.1.2 How This Comment Summary Report is Organized**

This Comment Summary Report is divided into two main sections. **Section S.1**, Introduction, provides an overview of the comment process; **Sections S.2** through

S.5 contain summary statements for all topics that received substantive comments during the public comment period.

## **S.2 ISSUE TOPICS**

### **S.2.1 Extension Request**

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#### *Summary*

Commenters, including local government and entities, requested additional time to review the Draft RMP/EIS. Requests were made to extend the public review period from 30 to 365 additional days. Commenters opined that the size of the document merits additional time for commenters to adequately provide substantive comments.

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### **S.2.2 Planning Issues and Criteria**

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#### *Summary*

Issue 1—The BLM is not effectively consulting and coordinating with other governmental agencies. Existing agreements between the BLM and cooperating agencies have not been fully considered.

Issue 2—Commenters listed specific statements they want added in the Planning Criteria and Legal Constraints sections of the Draft RMP/EIS (e.g., withdrawn and acquired lands administered by the Bureau of Reclamation).

Issue 3—Commenters requested that the BLM circulate a Supplemental Draft RMP/EIS to incorporate bill H.R. 3989 enacted as Public Law 113-291. Section 3092 of PL 113-291 considers the Tule Springs Fossil Beds National Monument Area.

Issue 4—A state governmental agency commented that the project may be subject to Bureau of Water Pollution Control (BWPC) permitting, which includes—but is not limited to—the following:

- Stormwater Industrial General Permit
- De Minimis Discharge General Permit
- Pesticide General Permit
- Drainage Well General Permit
- Temporary Permit for Discharges to Groundwater of the State
- Working in Waters Permit
- Wastewater Discharge Permits



- Underground Injection Control Permits
- On-site Sewage Disposal System Permits
- Holding Tank Permits

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### S.2.3 NEPA – Scoping Process

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#### *Summary*

The Draft RMP/EIS does not adequately address public comments and issues identified during the public scoping period (e.g., increasing access to public lands, recreation, OHV management, and renewable energy development).

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### S.2.4 NEPA – Range of Alternatives

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#### *Summary*

Commenters from various local and federal governmental agencies and organizations were concerned with the range of issues identified and addressed in the alternatives presented in the Draft RMP/EIS. Suggested topics to be included within—or as a new alternative—include:

- An economic development plan alternative
- A commodity-based alternative
- An average citizen alternative
- An alternative that includes protection of core and unfragmented habitat
- An alternative that increases the amount of land removed from withdrawal status

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### S.2.5 NEPA – Direct/Indirect Impacts

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#### *Summary*

Issue 1—Commenters were concerned with the format used to present the impact analysis in Chapter 4. They opined that a more appropriate approach would focus on how particular activities under each alternative affect each resource rather than describing how each aspect of the affected environment is impacted by all other aspects of the affected environment.

1 Issue 2—A federal governmental agency commented that this Draft RMP/EIS  
2 should evaluate the impacts of the new federal regulations being proposed to  
3 regulate coal-fired power plants under Section 111(d).

4 Issue 3—Commenters recommended that the impact analysis should include a  
5 consistent application of a resource-specific qualitative intensity scale, which  
6 would enable readers to more easily compare impacts across alternatives. Also, the  
7 impact analysis lacks analysis of subcategories within broader topics, which—if  
8 included—would provide a more comprehensive impact analysis.

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## 10 **S.2.6 NEPA – Cumulative Impacts**

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### 12 *Summary*

13 Commenters opined that the cumulative effects analysis should consider and  
14 describe actions being proposed in the Carson City District and Battle Mountain  
15 District RMP Revisions, and the Land Use Plan Amendment for the Greater Sage-  
16 Grouse.

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## 18 **S.2.7 NEPA – Mitigation Measures**

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### 20 *Summary*

21 Environmental organizations and local governmental entities suggested specific  
22 provisions and directions the BLM should take to adequately address mitigation  
23 measures in the Draft RMP/EIS, as follows:

- 24 • Adding an overall emphasis or coordinated plan for restoration of  
25 public lands in the planning area
- 26 • Incorporating a comprehensive mitigation strategy that is required to  
27 the extent practical and determined on a case-by-case basis. It includes  
28 the number of acres and locations where mitigation would be  
29 completed

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## 31 **S.2.8 GIS Data and Maps**

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### 33 *Summary*

34 Commenters opined that the maps accompanying the Draft RMP/EIS are at too  
35 broad of a scale for the level of detail the individual chapters discuss throughout  
36 the document. Commenters also provided specific examples of sections and  
37 parcels they would like to be viewable at a finer scale. Commenters also requested

1 that labels for specific boundaries and overlapping management be more clear so  
2 they can be easily identified (e.g., ACECs, ROWs, and RMZs).

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### 4 **S.2.9 FLPMA**

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#### 6 *Summary*

7 Issue 1—During the EIS process, the BLM did not coordinate or collaborate with  
8 all necessary entities as congressionally mandated in the FLPMA to be consistent  
9 with other federal, state, local, and tribal plans and policies.

10 Issue 2—The Draft RMP/EIS does not discuss in detail whether any effort has been  
11 made toward resolving inconsistencies with local and county natural resource  
12 policies or plans.

13 Issue 3—Alternatives in the Draft RMP/EIS fail to comply with the multiple-use  
14 mandates found in the FLPMA and the Multiple-Use Sustained-Yield Act of 1960.  
15 Specific inconsistencies were noted that include:

- 16 • ACEC designations
- 17 • Renewable energy development
- 18 • Surface use restrictions
- 19 • Groundwater withdrawals

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## 21 **S.3 RESOURCES**

### 22 **S.3.1 Air Resources**

#### 23 *Range of Alternatives*

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#### 25 *Summary*

26 Issue 1—The range of alternatives should incorporate best management practices  
27 (BMPs) or other actions to reduce wind-born dust emissions. Of particular concern  
28 is dust generated by motorized vehicle travel and the potential for asbestos  
29 exposure.

30 Issue 2—The BLM should develop a comprehensive list of mitigation measures to  
31 reduce impacts on air quality.

1 ***Best Available Information Baseline Data***

2  
3 *Summary*

4 The Draft RMP/EIS should cite the multi-agency 2011 Memorandum of  
5 Understanding (MOU) regarding air quality analysis and incorporate an air  
6 resources management plan as appropriate. The Affected Environment discussion  
7 should be updated to include more recent air emissions data and to differentiate  
8 between air quality conditions in different counties in the planning area.

9  
10 ***Impact Analysis***

11  
12 *Summary*

13 The analysis should disclose impacts from fugitive dust on climate change.

14  
15 ***Cumulative Impacts***

16  
17 *Summary*

18 The BLM should provide estimates for air emissions associated with renewable  
19 energy development; develop mitigation measures to reduce those emissions; and  
20 identify appropriate areas for renewable energy development through the analysis  
21 of direct, indirect, and cumulative impacts.

22  
23 **S.3.2 Climate Change**

24  
25 *Summary*

26 Issue 1—The Draft RMP/EIS fails to use the best available information to develop  
27 an appropriate range of alternatives to minimize contributions to climate change.  
28 The impact analysis fails to take a hard look at impacts on climate change.

29 Issue 2—The Draft RMP/EIS should disclose whether an analysis of impacts from  
30 greenhouse gas emissions is useful.

31  
32 **S.3.3 Night Sky**

33  
34 *Summary*

35 The Draft RMP/EIS should incorporate and analyze night-sky protection  
36 measures.

**S.3.4 Noise**

***Best Available Information Baseline Data***

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*Summary*

The Draft RMP/EIS should use acoustic modeling to identify and protect the natural soundscape from motorized vehicles and other sources of noise.

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***Impact Analysis***

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*Summary*

Issue 1—The Draft RMP/EIS should analyze the impacts of noise on sensitive human receptors (including nonmotorized recreation users) and wildlife.

Issue 2—Commenters provided specific suggestions that they opined should be incorporated into the Draft RMP/EIS to further describe impacts on the acoustic environment and night sky conditions. They suggested that the alternatives integrate effective mitigation methods and techniques to minimize impacts from noise and artificial lighting.

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**S.3.5 Airspace**

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*Summary*

Commenters provided maps identifying areas where land use conflicts may occur from a military training route passing through proposed wind energy zones.

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**S.3.6 Soil Resources**

***Impact Analysis***

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*Summary*

Issue 1—Commenters suggested that the Draft RMP/EIS describes a methodology for analyzing impacts on soils that uses quantitative data. The analysis itself, however, is qualitative in nature.

Issue 2—Commenters suggested the analysis of impacts on soils is inadequate for the following reasons:

- Contrary to what is stated in the Draft RMP/EIS, impacts under Alternatives 2, 3, and 4 would vary
- There needs to be explanation of what is meant by “areas with high potential”
- The analysis focuses too narrowly on soil crusts
- Impacts from weed management plans are misstated and not fully disclosed
- There needs to be clarification on the tradeoff for not requiring weed management plan for impacts less than five acres in size
- There needs to be clarification on what is meant by “significant adverse effects”
- There needs to be clarification on how and when BMPs would be applied

In addition, the following impacts should be addressed for every alternative:

- Tamarisk removal
- Renewable energy development
- Herd management areas (HMAs) and horses
- Tourism and recreation
- Visual Resource Management classifications
- Removal of structures
- Mineral development
- Wilderness Study Areas if they are released

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### **S.3.7 Water Resources**

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#### *Summary*

The Draft RMP/EIS erroneously states that the Southern Amargosa eMbedded Model (SAMM) and Version 2 of the regional model are complete. In fact, they are still under development and should be described as such.

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#### *Range of Alternatives*

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#### *Summary*

1 Issue 1—Commenters suggested the range of alternatives is too narrow because it  
2 would preclude any development. Likewise, the range of alternatives for the  
3 Amargosa Valley area is not comprehensive.

4 Issue 2—The BLM should expand its management objectives to address both  
5 water resources and related values.

6 Issue 3—The BLM is overstepping its authority regarding the physical and legal  
7 availability of water, including in dry washes.

8 Issue 4—The Draft RMP/EIS alternatives inadequately address regional  
9 groundwater issues. Protecting hydrologic function has no value; this should be  
10 better explained and made available for comment.

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11  
12 ***Best Available Information Baseline Data***

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13  
14 ***Summary***

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15 Issue 1—The Draft RMP/EIS should clarify the roles of federal agencies as they  
16 relate to water law.

17 Issue 2—Flood control facilities in the ULVW system—and their capacity to  
18 mitigate flood impacts—are not adequately described.

19 Issue 3—The Draft RMP/EIS incorrectly categorizes how certain streams and  
20 rivers have been assessed by Nevada Division of Environmental Protection; the  
21 303(d) list is out of date; and the total maximum daily load (TMDL) list is  
22 incorrect.

23 Issue 4—Further clarification is needed to explain how the BLM analyzes impacts  
24 on water resources at the project-specific implementation level, and the Draft  
25 RMP/EIS should use the best available science.

26 Issue 5—Amargosa Valley modeling is not final.

27 Issue 6—Only US EPA and NDEP can improve water quality due to TMDLs.

28 Issue 7—The Draft RMP/EIS makes an incorrect assumption about domestic well  
29 water consumption. Water level trends should be correctly described.

30 Issue 8—The perennial yield of Pahrump Basin is incorrectly described.

31 Issue 9—The Draft RMP/EIS should specify which basins are fully or over-  
32 appropriated regarding water rights, including the Amargosa Desert Hydrographic  
33 Basin.

1 Issue 10—The description about EPA criteria for water quality related to toxins  
2 should state if there are any known or existing impacted bodies of water in the  
3 planning area.

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4  
5 ***Impact Analysis***

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6  
7 *Summary*

8 Issue 1—Renewable Energy. Commenters suggested the following:

- 9 • The analysis of impacts from renewable energy development relies on  
10 faulty information and ignores differing impacts from the various  
11 renewable energy technologies.
- 12 • Renewable energy development should be prohibited from using  
13 groundwater in the Amargosa Valley. The Proposed RMP/Final EIS  
14 should require use of water from outside this area.
- 15 • The analysis of impacts from renewable energy development should  
16 include photovoltaic technology on the list of measures used to reduce  
17 pumping impacts. Additionally, the analysis lacks an evaluation of  
18 basins where additional appropriation of water to support renewable  
19 energy development may be difficult.

20 Issue 2—Amargosa Valley Basin. Commenters suggested the following:

- 21 • The Amargosa Valley should not be recommended for disposal  
22 because of potential impacts on federally listed species and water  
23 resources-related values.
- 24 • New information is available to warrant a reevaluation of both the  
25 location and areal extent of lands designated for disposal within  
26 Amargosa Valley. Specifically, committed water rights in the basin  
27 exceed the perennial yield, and current water use may affect senior  
28 water right holders.
- 29 • The current rates of water level decline in areas of the Amargosa  
30 Valley basin are unsustainable, and an increased demand for water  
31 associated with potential development on disposed lands will further  
32 exacerbate this condition.
- 33 • The analysis misstates the rate of annual recharge in the Amargosa  
34 Valley basin.
- 35 • The Draft RMP/EIS biological opinion includes the entire extent of  
36 the Amargosa Valley and Amargosa Desert Hydrographic Basin, as  
37 cumulative impacts will likely impact water resources that support the  
38 Devils Hole habitat.



1 Issue 3—National Park Service Lands and Water Rights. Commenters suggested  
2 the following:

- 3 • The analysis fails to evaluate the potential effects on Lake Mead that  
4 might result from pumping associated with the disposal of lands near  
5 the Moapa-Glendale-Logandale areas.
- 6 • The RMP would significantly affect water resources in Death Valley  
7 National Park.
- 8 • The analysis should include an evaluation of the potential effects on  
9 NPS springs located in the Overton Arm area of Lake Mead NRA.
- 10 • The analysis fails to acknowledge adverse impacts on the senior water  
11 right at Devils Hole, senior water rights for springs in Ash Meadows,  
12 and federally reserved claims for water for springs in the Furnace  
13 Creek area of Death Valley.

14 Issue 4—Modeling. Commenters suggested the following:

- 15 • The analysis should be revised to indicate the groundwater model is a  
16 “more reliable” decision-making tool in the Muddy River Springs  
17 Area portion of the field office coverage area, but less reliable in the  
18 Tule Desert and Virgin River Valley basins, as the model is not  
19 calibrated to actual pumping impacts in these two latter basins at this  
20 time.
- 21 • Pumping impacts on the Warm Springs area related to the Lower  
22 Meadow Valley Wash land disposal cannot be accurately evaluated  
23 based on the modeling results, since existing and proposed pumping  
24 of sufficient magnitude (1,000 acre-feet/year or greater) was not  
25 identified in this basin for simulation purposes.
- 26 • The analysis should acknowledge that neither the SAMM model nor  
27 Version 2 of the Death Valley Regional Flow System model (upon  
28 which SAMM relies) are completed. Likewise, it should acknowledge  
29 that no detailed report on the modeling effort is currently available.

30 Issue 5—Land Disposal. Commenters suggested the following:

- 31 • The analysis of impacts from land disposal is inconsistent with DOI  
32 Order 1169 Pumping Study report to the Nevada State Engineer and  
33 the Nevada State Engineer’s Rulings following the Order 1169. There  
34 is no data to substantiate the assertion that lands identified for disposal  
35 are affecting water resources.
- 36 • The analysis should fully evaluate restrictions on groundwater use  
37 with respect to lands proposed for disposal.

38 Issue 6—Other. Commenters suggested the following:

- The analysis misstates the relationship between hydrology and the Las Vegas buckwheat and Las Vegas bearpoppy.
- The analysis of impacts from fluid mineral development is incomplete.
- The analysis misstates information about local recharge in the Warm Springs Complex (the Muddy River Springs) and the portion of the Muddy River which is located in the Muddy River Springs Area and California Wash.
- The analysis needs to measure impacts quantitatively.
- Water resource development scenarios used in the analysis should reflect those used by local governments.

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### ***Cumulative Impacts***

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#### ***Summary***

The Draft RMP/EIS should analyze cumulative impacts on water resources from renewable energy development and land tenure adjustments.

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### ***Mitigation Measures***

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#### ***Summary***

Issue 1—The Draft RMP/EIS should analyze cumulative impacts on groundwater in Hydrographic Basin 230 and especially the Ash Meadows National Wildlife Refuge (NWR).

Issue 2—Impacts should be minimized by prohibiting increases in groundwater withdrawals.

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## **S.3.8 Water Rights**

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#### ***Summary***

Issue 1—The Draft RMP/EIS should:

- Include broader options for negotiating water rights applications
- Clarify which parties are responsible for administering water rights
- Clarify the relationship between mineral development and protesting of water rights

1 Issue 2—The impact analysis should disclose the relationship between land tenure  
2 and water rights and resources.

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### 4 **S.3.9 Integrated Vegetation – Vegetation**

#### 5 ***Range of Alternatives***

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##### 7 *Summary*

8 The Draft RMP/EIS should incorporate a cooperative management strategy for  
9 flood control and water diversions. The alternatives should include options for  
10 mechanical removal of mesquite and acacia.

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#### 12 ***Best Available Information Baseline Data***

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##### 14 *Summary*

15 Issue 1—The Draft RMP/EIS should use the best available information to describe  
16 vegetation community recovery time frames. The list of state-listed species is  
17 incomplete.

18 Issue 2—The BLM should clarify how the Integrated Vegetation relates to the  
19 affected environment for the Proposed RMP/Final EIS.

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#### 21 ***Impact Analysis***

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##### 23 *Summary*

24 Issue 1—The Draft RMP/EIS should disclose impacts from trespass grazing on  
25 riparian areas.

26 Issue 2—Impacts from wildland fire management are understated. Impacts from  
27 mineral development are misrepresented.

28 Issue 3—The Draft RMP/EIS should fully analyze direct and indirect impacts of  
29 energy development, weed treatments, special status species management, and fish  
30 and wildlife management on vegetation.

31 Issue 4—Summaries should be provided instead of referring the reader to other  
32 sections.

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#### 34 ***Mitigation Measures***



**S.3.11 Vegetation – Weeds**

***Range of Alternatives***

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*Summary*

Issue 1—The Draft RMP/EIS should require additional requirements for obtaining and using weed-free gravel.

Issue 2—The alternatives should include measures to reduce impacts from integrated pest management on birds.

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***Impact Analysis***

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*Summary*

Issue 1—The Draft RMP/EIS should disclose tradeoffs and economic impacts associated with weed-free gravel requirements.

Issue 2—Impacts on weeds from wild horses and burros should be addressed.

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**S.3.12 Fish and Wildlife**

***Range of Alternatives***

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*Summary*

Issue 1—Commenters suggested that the alternatives lack sufficient detail to be adequately analyzed and that a supplemental EIS is needed.

Issue 2—Biomass removal should occur outside avian nesting season to comply with the Migratory Bird Treaty Act.

Issue 3—The BLM should coordinate with appropriate agencies to develop BMPs and stipulations to protect wildlife.

Issue 4—Adaptive management is not adequately incorporated into the Draft RMP/EIS.

Issue 5—Commenters believe it would be helpful to clarify what activities will require a Bird and Bat Conservation Strategy during the NEPA process.

Issue 6—Larger buffers and/or more stringent wildlife protective measures are needed for raptors, natural waters, and associated riparian areas.

1 Issue 7—The range of alternatives is too narrow regarding livestock interactions  
2 with wildlife.

---

4 ***Best Available Information Baseline Data***

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6 *Summary*

7 Issue 1—Better data is needed to adequately monitor and analyze impacts on fish  
8 and wildlife species and their habitats.

9 Issue 2—Desert bighorn sheep should be identified as a game species.

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11 ***Impact Analysis***

---

13 *Summary*

14 Issue 1—The BLM should use a more rigorous analytical approach to evaluating  
15 wildlife impacts, especially how wildlife associate with vegetation communities  
16 and landscape characteristics.

17 Issue 2—Analysis of impacts from integrated pest management and renewable  
18 energy development and transmission is lacking.

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20 **Special Status Species**

21 ***Endangered Species Act – Section 7***

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23 *Summary*

24 Standards for categorizing impacts on desert tortoise should align with  
25 terminology used in the Endangered Species Act.

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27 ***Range of Alternatives***

---

29 *Summary*

30 Issue 1—Objectives in the Draft RMP/EIS should be measurable via quantitative  
31 means. For example, performance metrics should be utilized.

32 Issue 2—The Desert Tortoise Conservation Center should be part of the Bird  
33 Springs Area of Critical Environmental Concern (ACEC).

1 Issue 3—The Draft RMP/EIS needs to better explain “Areas of Ecological  
2 Importance,” including whether they would bring additional protection for desert  
3 tortoise.

4 Issue 4—Management criteria under Alternative 2 should be applied to Alternative  
5 3 to better support goal SSS-04.

6 Issue 5—Desert tortoise critical habitat should not be open to mineral entry.

7 Issue 6—There should be a minimum 4.3-mile corridor width of undisturbed desert  
8 tortoise habitat in all areas defined as US Fish and Wildlife Service priority  
9 connectivity habitat.

10 Issue 7—The Draft RMP/EIS should incorporate assessment of genetic  
11 connectivity into planning for species connectivity.

12 Issue 8—The BLM should designate the lands in the northwestern part of the  
13 Amargosa Desert as solar exclusion areas to protect desert tortoise. In the northern  
14 Amargosa Desert, desert tortoise habitat connectivity should be maintained from  
15 Death Valley National Park through the northern Amargosa Desert.

16 Issue 9—The Ash Meadows ACEC and solar exclusion area should extend to the  
17 west of Nevada State Highway 373 to ensure consistency with ACEC designations  
18 in California and to better protect desert tortoise.

19 Issue 10—The Draft RMP/EIS should include removal of variance lands in Sandy  
20 Valley (southern Mesquite Valley) and changing them to solar exclusion areas, as  
21 this is high-quality desert tortoise habitat. The Pahrump ACEC should be  
22 designated as a solar exclusion area to protect desert tortoise.

23 Issue 11—The Draft RMP/EIS should provide a plan for tortoise conservation in  
24 the Amargosa Desert to avoid undermining the overall conservation strategy for  
25 desert tortoise and impacting the national park’s resources.

26 Issue 12—South of the Old Spanish Trail and moving into Mesquite Valley should  
27 be designated as a solar exclusion area, as this area provides important desert  
28 tortoise habitat connectivity and is adjacent to protected BLM wilderness in  
29 California.

30 Issue 13—In Alternative 4, the Amargosa Desert Solar Energy Zone (SEZ) and the  
31 SEZ in the Pahrump Valley should be modified so they do not overlap high-quality  
32 modeled desert tortoise habitat.

33 Issue 14—The Draft RMP/EIS needs to clarify what areas are designated as desert  
34 tortoise habitat for the purposes of implementing a fire suppression strategy. The  
35 RMP/EIS should provide data used to determine how these areas were identified  
36 and the role fire suppression plays in determining these areas.

Issue 15—BLM should consider a modified desert tortoise active season based on the PBO.

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#### ***Best Available Information Baseline Data***

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##### *Summary*

Commenters suggested that the Draft RMP/EIS does not utilize the best available information to support a meaningful impact analysis. Specific concerns include the following:

- Habitat requirements of individual species and their spatial configuration on the landscape were not considered.
- The Draft RMP/EIS fails to look beyond the planning area boundaries and to consider opportunities for management consistent with neighboring lands.
- Important regional desert tortoise research has not been incorporated into the Draft RMP/EIS. Additional information should be provided regarding the definition of severing habitat connectivity.
- Preservation of habitat connectivity requires a 0.5 percent cap on development. The Draft RMP/EIS should more clearly define disturbance caps and associated methodology for desert tortoise using the Desert Renewable Energy Conservation Plan and US Fish and Wildlife Service input as models.
- There needs to be clarification on whether the Large-Scale Translocation Site fencing will be removed and, if applicable, to justify the decision to remove it.
- Important desert tortoise habitat should be managed as wind exclusion areas.
- Solar variance areas do not adequately protect desert tortoise habitat.
- Documentation of irretrievable commitment of resources should be included, especially as it pertains to desert tortoise habitat.
- Recent studies addressing bighorn sheep survival and habitat connectivity should be added to the Draft RMP/EIS.
- Protection of priority bighorn sheep areas is not based on the best available information.
- The desert bighorn sheep description provides insufficient information on the meta-population demographic structure of the population and the consequences of habitat fragmentation. Important research is absent from the Draft RMP/EIS.
- The Draft RMP/EIS does not address landscape-scale habitat connectivity for desert bighorn sheep.



- The yellow-billed cuckoo is now listed as threatened, and critical habitat has been proposed; it is no longer a candidate species.
- The Yuma clapper rail, now called the Yuma ridgeway rail, also occurs at Ash Meadows National Wildlife Refuge.
- Species that do not occur in southern Nevada were erroneously included throughout the Special Status Species section in the Draft RMP/EIS.
- The Draft RMP/EIS should clarify that white nose syndrome has not been documented in or near the planning area.

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## ***Impact Analysis***

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### *Summary*

Issue 1—The Draft RMP/EIS fails to adequately analyze impacts on special status species and critical habitat from the following actions:

- Renewable energy and fluid mineral development
- Recreational activities and motorized vehicle travel, including speed races
- Climate change
- Lands and realty actions, including land disposals in desert tortoise habitat
- Actions that would limit desert tortoise habitat linkage corridors

Issue 2—More data are needed to substantiate the following conclusions:

- Impacts on special status species from motorized vehicle travel in the Nellis Dunes area will not be negligible or minor
- Present and anticipated future impacts on Devil’s Hole pupfish
- Impacts from motorized travel in Alternatives 2 and 3 would be “major”
- A 1.4-mile habitat connectivity corridor is needed

Issue 3—The Draft RMP/EIS should mandate no net loss of vegetation communities, and all activities should include required mitigation to minimize impacts on vegetation communities. The analysis fails to acknowledge the following:

- Pahrump Valley buckwheat populations extend across state borders, and the species is, thus, more resilient than described.
- Assumptions regarding toxic chemicals and landfills are incorrect and assume a far greater risk to special status species than is accurate.

1 Issue 4—The draft RMP/EIS falsely associates land withdrawals with adverse  
2 impacts on special status species, including the potential for federal listing under  
3 the Endangered Species Act.

4 Issue 5—The AEIs proposed by Nye County are being inappropriately  
5 incorporated. The purpose of the proposed AEIs is to offset/mitigate development  
6 in Alternatives 1, 3, and 4.

7 Issue 6—The Draft RMP/EIS should include alternatives to blading or grading  
8 sites, such as mowing and raising fences to allow tortoises to live on site, when  
9 constructing large-scale renewable energy projects in desert tortoise habitat.

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### 11 *Cumulative Impacts*

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#### 13 *Summary*

14 Issue 1—The Preferred Alternative understates adverse cumulative impacts on  
15 desert tortoise and does not disclose the impacts from landfills on predator  
16 attractant and the resultant impacts on desert tortoise.

17 Issue 2—BLM should address the cumulative impacts resulting from large scale  
18 development on habitat linkages for desert tortoise and bighorn sheep and recovery  
19 of those species.

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### 21 *Mitigation Measures*

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#### 23 *Summary*

24 Issue 1—The Preferred Alternative should be modified to allow for voluntary  
25 relinquishment and retirement of certain active allotments containing special status  
26 species.

27 Issue 2—The RMP/EIS should describe how the BLM proposes to mitigate for  
28 thousands of acres of desert tortoise habitat loss and to ensure habitat remains  
29 functional within tortoise linkages and other sensitive habitats.

30 Issue 3—The RMP/EIS should include a framework for conservation of desert  
31 tortoise linkage habitat.

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## 33 **S.3.13 Wild Horses and Burros**

### 34 *Range of Alternatives*

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1 *Summary*

2 Issue 1—The alternatives, including desired population growth rates, would  
3 establish policies that contradict the recommendations of the National Academy of  
4 Sciences (NAS) 2013 report, “Using Science to Improve the BLM Wild Horse and  
5 Burro Program: A Way Forward.”

6 Issue 2—The alternatives do not provide enough protection for wild horses and  
7 burros. The following actions should be included:

- 8 • Implement necessary range improvements, prioritize the removal of  
9 overpopulated livestock, and prohibit disruptive activities to eliminate  
10 the need for roundups and removals
- 11 • Prohibit commercial activities that disrupt wild horses and burros
- 12 • Increase appropriate management levels (AMLs)
- 13 • Relocate wandering horses and burros back inside HMA boundaries
- 14 • Preserve the burro population in Gold Butte HMA
- 15 • Do not allow predator eradication
- 16 • Do not consider spaying and castrating
- 17 • Make populations and AMLs science-based with a clear preference  
18 for wild horse and burro protection

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20 ***Best Available Information Baseline Data***

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21 *Summary*

23 Issue 1—The Draft RMP/EIS lacks adequate documentation on the following  
24 topics:

- 25 • How HMAs established by the 1998 RMP are being changed or  
26 eliminated in this RMP revision process
- 27 • How the BLM can alter HMAs without altering AMLs

28 Issue 2—The Draft RMP/EIS fails to acknowledge that wild horses and burros are  
29 nonnative species.

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31 ***Impact Analysis***

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32 *Summary*

34 Issue 1—The Draft RMP/EIS fails to adequately analyze the following impacts on  
35 wild horses and burros:

- Genetic health, spaying and castrating, sterilization, and sex ratios
- Lands and realty management under Alternatives 1 or 3

Issue 2—The Draft RMP/EIS fails to analyze impacts on natural resources caused by feral horses and burros.

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### ***Cumulative Impacts***

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#### ***Summary***

The Draft RMP/EIS fails to fully analyze the economic benefits of tourism for wild horses and burros as well as the adverse impacts on the animals themselves.

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## **S.3.14 Cave and Karst Management**

### ***Range of Alternatives***

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#### ***Summary***

Issue 1—The alternatives should be strengthened to provide immediate mitigation and consultation in the event that previously unknown cultural resources in a cave or karst area are discovered.

Issue 2—The Proposed RMP/Final EIS should define what constitutes a “significant” cave.

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### ***Best Available Information Baseline Data***

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#### ***Summary***

Known caves should be analyzed for inclusion under the Federal Cave Protection Act of 1988.

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## **S.3.15 Wildland Fire Management**

### ***Range of Alternatives***

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#### ***Summary***

One commenter requested that the existing area designated as “Fire Management Unit” south of NV Highway 163 be deleted from FMU Alternative 3 for the Laughlin Fire Management Unit.

***Best Available Information Baseline Data***

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***Summary***

One commenter requested revision of the Draft RMP/EIS to clarify what a designated natural area is.

***Impact Analysis***

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***Summary***

Issue 1—One commenter felt the impact analysis in Chapter 4 had insufficient supporting data. The Draft RMP/EIS should be revised to include data to support impact analysis conclusions.

Issue 2—Commenters provided specific examples of where data could be used to improve analysis, including data related to fire ignitions in wind turbine fields.

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**S.3.16 Cultural Resources**

***Range of Alternatives***

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***Summary***

Issue 1—Commenters requested clarification on specific cultural resource management actions in **Table 2.11** and **Table 2.12**, including:

- Existing structures and ROWs that do not require new ground disturbance
- Upper Las Vegas Wash boundaries
- “Management for conservation” and the criteria for releasing these cultural sites
- The action plan to conduct broad sample cultural resource surveys
- Scientific, conservation, and educational use of cultural resource sites
- Memorandums of understanding
- Mitigation, monitoring, and surveillance
- Research designs
- Conservation potential
- Buffers

- Public uses
- Spirit Mountain
- Cultural priority area selection
- Interpretation
- In-situ or on-site burial

Issue 2—Commenters stated the range of alternatives for cultural resources is inadequate. The Draft RMP/EIS fails to consider an alternative in which cultural resources would be given adequate protection through individualized, tailored management strategies. Commenters provided specific examples of resources that do not make a distinction between the four alternatives.

Issue 3—**Table 2.12** should be revised in the Proposed RMP/Final EIS to focus on the historical importance of each cultural resource or site to guide its management decisions.

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### ***Best Available Information Baseline Data***

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#### ***Summary***

Issue 1—Commenters requested the BLM confirm the accuracy of the data used to describe Arrowhead Trail, Old Spanish Trail, and St. Thomas cultural area.

Issue 2—Commenters provided specific language regarding cultural landscapes that should be included in **Section 3.2.11**.

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### ***Impact Analysis***

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#### ***Summary***

Issue 1—Commenters disagreed with the impact analysis conclusions on cultural resources and stated that some analysis conclusions do not satisfy the requirements for NEPA impact analysis. Specifically, commenters felt the Draft RMP/EIS should be revised to improve analysis of impacts from travel and transportation, air quality, wilderness lands, and minerals.

Issue 2—Commenters indicated the Proposed RMP/Final EIS needs to analyze the impacts on culturally significant water features, medicinal plants, and petroglyphs.

Issue 3—Commenters indicated the Proposed RMP/Final EIS needs to include:

- Analysis of impacts on cultural resources from proposals to avoid or mitigate cultural resources

- Analysis of disagreements between the BLM and the affected federally recognized tribes

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## ***Cumulative Impacts***

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### ***Summary***

One commenter indicated the Draft RMP/EIS fails to adequately analyze cumulative impacts on cultural resources. Specifically, the Proposed RMP/Final EIS needs to consider the effects of past actions, such as preexisting mineral leases, and foreseeable future actions, such as the Six State Solar Energy Program.

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## **S.3.17 National Historic Trails**

### ***Best Available Information Baseline Data***

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#### ***Summary***

Commenters provided specific language related to National Historic Trails that should be added to **Chapter 3**, including:

- Clarification that trails can occur on public or private lands
- Legislation authorizing the Old Spanish Trail
- The need for further studies to describe Old Spanish Trail characteristics
- High Potential Trail segment characteristics.

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### ***Impact Analysis***

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#### ***Summary***

Commenters indicated the Draft RMP/EIS should be revised to adequately analyze impacts on National Historic Trails from OHV travel and renewable energy development.

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## **S.3.18 Paleontological Resources**

### ***Range of Alternatives***

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#### ***Summary***

One commenter provided suggested components to be added to alternatives, including requiring field surveys and data collection prior to any surface-disturbing activities.

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### ***Impact Analysis***

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#### ***Summary***

One commenter indicated that the BLM has failed to consider impacts on paleontological resources from flood and sediment damage.

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## **S.3.19 Visual Resource Management**

### ***Range of Alternatives***

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#### ***Summary***

Issue 1—Commenters suggested changes to VRM decisions in the alternatives, including:

- VRM Class II management of land between the highway and the base of the Newberry Mountains, and the viewshed from the intersection of US Highway 95 east along State Route 163
- VRM Class I management in Amargosa Valley, Bitter Springs Valley, Gale Hills, Bitter Springs ACEC, Nelson, and Hiko Spring ACEC
- VRM Class I for wilderness areas and WSAs only
- VRM Class IV for proposed renewable energy development areas

Issue 2—Commenters noted inconsistencies between VRM classification, including areas of Class III VRM located immediately adjacent to Class I VRM areas (the Eldorado Wilderness, Muddy Mountain Wilderness, and Ireteba Wilderness), and ROW corridors that cross multiple designations.

Issue 3—Commenters considered the VRM subjective with vague parameters and lacking data to support rationale. The Draft RMP/EIS should be revised to comply with BLM Manual H-8410-1.

Issue 4—Commenters requested clarification of what constitutes change to “existing character” when managing for VRM classifications and questioned the use of buffers as a method to preserve VRM character.

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### ***Best Available Information Baseline Data***



1  
2 *Summary*

3 Issue 1—One commenter was concerned that the Draft RMP/EIS lacks adequate  
4 data to justify VRI classifications. The Proposed RMP/Final EIS should include  
5 the Key Observation Points (KOPs) that were used for the determinations of the  
6 four VRI classes.

7 Issue 2—One commenter noted that the California Desert Protection Act of 1994  
8 specifies protection of the scenic resources in Mojave National Preserve and  
9 should be referenced in the RMP.

10  
11 *Impact Analysis*

12  
13 *Summary*

14 Commenters recommended additional analysis of several impacts related to the  
15 visual resources of designated areas by solar and wind energy development.

16  
17 **S.3.20 Lands with Wilderness Characteristics**

18 *Range of Alternatives*

19  
20 *Summary*

21 Issue 1—Commenters were concerned that the alternatives lacked a balance  
22 regarding lands with wilderness characteristics that are proposed for protective  
23 management. Commenters requested that the BLM provide additional justification  
24 for including or not including certain areas in the lands with wilderness  
25 characteristics designation under the alternatives.

26 Issue 2—Commenters questioned the BLM's authority to restrict construction of  
27 new structures and to remove existing structures and facilities within federally  
28 designated utility corridors.

29  
30 *Best Available Information Baseline Data*

31  
32 *Summary*

33 Issue 1—Commenters expressed concern that the BLM's inventories of lands with  
34 wilderness characteristics were incomplete, inaccurate, did not follow qualifying  
35 boundary features, or were generally not consistent with BLM Manual 6310.  
36 Commenters recommended specific areas that are designated as lands with

wilderness characteristics be dropped from further consideration. They also provided specific examples where inventories should be completed or modified in order to comply with BLM Manuals 6310 and 6320.

Issue 2—Commenters were concerned that the BLM’s lands with wilderness characteristics inventory was completed prior to release of new BLM guidance (BLM Manual 6320) for lands with wilderness characteristics.

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## **S.4 RESOURCE USES**

### **S.4.1 Livestock Grazing**

#### ***Range of Alternatives***

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##### *Summary*

Under all alternatives, the BLM should permanently close all of the allotments acquired by the Clark County Desert Conservation Program from willing sellers in fulfillment of the Clark County Multiple Species Habitat Conservation Plan and associated Take Permit. These allotments all had their preferences relinquished to the BLM with the understanding that they would be permanently closed to support desert tortoise habitat:

- Arrow Canyon
  - Battleship Wash within the Arrow Canyon Allotment
  - Bunkerville
  - Christmas Tree Pass
  - Gold Butte
  - Hen Springs
  - Ireteba Peaks
  - Jean Lake
  - McCullough Mountains
  - Mesa Cliffs
  - Table Mountain
  - Roach Lake
  - Toquop Sheep
  - Upper Mormon Mesa
  - White Basin
-

1 ***New Alternatives***

2  
3 ***Summary***

4 The BLM should consider prescriptive grazing as part of the restoration planning,  
5 especially the use of goats, to help control invasive plants.

6  
7 **S.4.2 Minerals - Fluid Minerals**

8 ***Range of Alternatives***

9  
10 ***Summary***

11 The BLM should consider closing all areas identified as having low or very low  
12 potential for oil/gas development to fluid mineral leasing. The BLM should also  
13 consider closing or applying NSO stipulations to those areas with demonstrated  
14 sensitive resources that would be impacted by oil/gas development. These areas  
15 would include:

- 16 • Tortoise habitat and linkages
- 17 • Riparian areas
- 18 • Locations with listed species, such as Amargosa Valley, Devil's Hole,  
19 Muddy River Springs, and Ash Meadows
- 20 • Groundwater basins

21 Additionally, the BLM needs to include the recommended US Fish and Wildlife  
22 Service terms and conditions for application to fluid mineral leases. The BLM  
23 should also consider the isolated parcels next to the Moapa Band of Paiutes  
24 Reservation as closed to mineral leasing. The BLM should consider doing a Master  
25 Leasing Plan for the Muddy Mountains area as part of the RMP. The BLM should  
26 consider requiring water quality monitoring by all operators in the planning area.  
27 The BLM should consider changing the allocations of lands around the Lake Mead  
28 NRA to closed or NSO under all alternatives.

29  
30 ***Best Available Information Baseline Data***

31  
32 ***Summary***

33 The BLM needs to develop or release the Reasonably Foreseeable Development  
34 Scenario to support their affected environment and impact analysis for fluid  
35 minerals.

**S.4.3 Minerals – Solid Minerals**

***Range of Alternatives***

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***Summary***

In the Proposed Plan, the BLM should close the areas surrounding Ash Meadows NWR and Devils Hole to solid mineral leasing.

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***Impact Analysis***

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***Summary***

The BLM needs to describe the nature, types, and magnitude of impacts on resources rather than rely on cursory statements regarding adverse impacts. The BLM should include the time and cost impacts from VRM Class II allocation on solid mineral leasing as well as the specific effects from solid mineral leasing on cultural resources. Examples provided by the commenters include specific descriptions of the surface disruption associated with infrastructure and access, increased particulates and emissions from transit vehicles, increases in natural erosion, traffic increases, and degradation of traditional cultural properties and other sensitive areas. The lack of specificity does not allow for adequate discernment in differences between alternatives.

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**S.4.4 Locatable Minerals**

***Range of Alternatives***

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***Summary***

The BLM should close the areas surrounding Ash Meadows NWR, Devils Hole, and Muddy River Springs to locatable mineral leasing where they have the potential to impact hydraulically sensitive species and aquatic resources in the Proposed Plan.

---

***Impact Analysis***

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***Summary***

Issue 1—The BLM needs to analyze the impacts of linear ROW developments within the Big Dune SRMA on the commodity uses occurring in the area, including mining, geothermal development, oil/gas development, and the economics of the

region. Including a map illustrating the commodities and area analyzed would also be useful in understanding the scope of the analysis.

Issue 2—When analyzing the effects of withdrawing areas, the BLM needs to consider the report “Mineral Resource Assessment of Selected Areas in Clark and Nye Counties, Nevada,” edited by Steve Ludington, US Geological Survey Scientific Investigations Report 2006-5197.

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#### **S.4.5 Minerals – Salable Minerals**

##### ***Range of Alternatives***

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##### ***Summary***

The BLM should close the areas surrounding Ash Meadows NWR, Devils Hole, and Muddy River Springs to salable mineral leasing where they have the potential to impact hydraulically sensitive species and aquatic resources, as well as close areas of designated tortoise habitat in the Proposed Plan. The BLM also needs to close the 700-acre parcel of BLM-administered land between Inspirada and Sloan boundary, as the West Henderson Plan calls for the preservation of the natural drainages in this area. The BLM should close the Overlay District area in and near the planned Ivanpah Airport to salable minerals.

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##### ***Impacts Analysis***

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##### ***Summary***

The BLM should include an analysis of the costs related to moving the Cind-R-Lite mining operations to other areas.

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#### **S.4.6 Recreation**

##### ***Range of Alternatives***

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##### ***Summary***

Issue 1—There is no information to support the lifting of shooting closures on BLM land in Nye County in Alternative 3.

Issue 2—Alternatives 2 and 3 should include some lands not proposed as SRMAs or ERMAs.

1 Issue 3—The alternatives are balanced in favor of motorized recreation versus  
2 nonmotorized recreation. There are relatively few management actions  
3 complementing nonmotorized recreation opportunities and experiences.

4 Issue 4—Target shooting should be prohibited within desert tortoise critical habitat  
5 ACECs and other conservation areas for desert tortoise.

6 Issue 5—Desert tortoise recovery should be a priority in the Clark County North  
7 ERMA, Clark County South ERMA, Clark County West, Jean Lake/Roach  
8 SRMA, Las Vegas Valley SRMA, Muddy Mountains SRMA/ERMA, and Gold  
9 Butte SMRA/ERMA.

10 Issue 6—The proposed designation and management prescriptions for Las Vegas  
11 Valley SRMA Fossil Beds RMZ are outdated with the passage of S. 974/H.R.  
12 2015.

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13  
14 ***Best Available Information Baseline Data***

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15  
16 ***Summary***

17 Issue 1—The Draft RMP/EIS fails to acknowledge education efforts, partnerships,  
18 and other actions taken by OHV riders to manage this type of use. These actions  
19 should be proposed in the alternatives.

20 Issue 2—There is inadequate baseline information concerning target shooting  
21 closures or what constitutes a recreational shooting area. Impacts on target shooters  
22 are not disclosed, and the Draft RMP/EIS does not consider a reasonable range of  
23 actions to manage shooting.

24 Issue 3—There is too little background data and trends for recreation users to  
25 support the actions proposed in the alternatives.

26 Issue 4—The Draft RMP/EIS should be updated to reflect the fact that Nellis  
27 Dunes is no longer comprised of BLM-administered land.

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28  
29 ***Impacts Analysis***

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30  
31 ***Summary***

32 Issue 1—The Draft RMP/EIS does not adequately analyze the impacts of land  
33 disposal, ACEC designations, and restrictive VRM classifications on OHV  
34 recreation.

1 Issue 2—The analysis does not disclose a need to restrict camping to designated  
2 sites only in Alternative 2.

3 Issue 3—The analysis does not differentiate between the relative impacts of  
4 recreational OHV use versus construction activities.

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5  
6 ***Cumulative Impacts***

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7  
8 *Summary*

9 Issue 1—For each alternative, the Proposed RMP/Final EIS should analyze the  
10 cumulative impacts on OHV recreation.

11 Issue 2—The Proposed RMP/Final EIS should analyze cumulative impacts of  
12 recreation users trespassing on adjacent tribal lands.

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13  
14 **S.4.7 Recreation – SRMAs**

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15  
16 *Summary*

17 Issue 1—The Proposed RMP/Final EIS should include a definition of Special  
18 Recreation Management Areas and Extensive Recreation Management Areas.

19 Issue 2—The Proposed RMP/Final EIS should include an objective to protect the  
20 scenic and backcountry values adjacent to Lake Mead National Recreation Area.

21 Issue 3—The Proposed RMP/Final EIS should contain actions to protect newly  
22 discovered cultural resources in SRMAs and to prevent them from being damaged.

23 Issue 4—Multi-use recreational trails and natural areas are also important to  
24 Laughlin residents, and the SRMA should be managed to promote them.

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25  
26 **S.4.8 Recreation – ERMAs**

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27  
28 *Summary*

29 Issue 1—The east boundary of the Clark County West ERMA should not be used  
30 for staging motorized events, because this area provides valuable, nonmotorized  
31 recreation opportunities.

32 Issue 2—The BLM should not propose management in the Pahrump Valley ERMA  
33 that would reduce public access.

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**S.4.9 Travel and Transportation**

***Range of Alternatives***

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*Summary*

Issue 1—Commenters believe:

- The BLM should not allocate the Big Dunes SRMA as an open area, as it does not meet the requirements and criteria outlined in BLM Manual 1626.
- The BLM needs to explain the difference in the allocations of “Limited to Designated Routes” and “Limited to Existing Roads, Trails, and Dry Washes.”
- The calculations presented in the travel allocations of Chapter 2 appear to be incorrect and unsupported by the itemized breakdown of acres; the BLM needs to review and revise them as appropriate.
- The BLM needs to better explain that dry washes will be considered during implementation level travel management planning.
- The BLM needs to include alternatives that include travel management education, as it is a requirement of the BLM’s National Management Strategy for Motorized Off-Highway Vehicle Use on Public Lands.
- The BLM does not have a balanced open-to-closed areas ratio in the range of alternatives.
- All of the alternatives are more heavily weighted to open areas when the number of closed areas outside WSAs are considered.

Issue 2—The BLM should include a restriction that limits vehicles and equipment to existing roads and trails whenever possible.

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***Best Available Information Baseline Data***

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*Summary*

The BLM should include a list of the county roads that have been historically used and approved by Nye County. The BLM needs to recognize R.S. 2477 roads in the RMP.

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**Impacts Analysis**

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**Summary**

The BLM needs to present analysis that explains how travel management actions, such as signage, enforcement, etc., will reduce impacts from usage in the OHV “Limited” areas. The BLM needs to analyze the long-term and potential effects of conveying established disposal areas adjacent to or overlapping OHV facilities.

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**Cumulative Impacts**

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**Summary**

The BLM needs to analyze the cumulative effects from all the ACECS on OHV recreation. The BLM has not presented the cumulative effects of all the road closures on users’ experiences and other socioeconomic factors under each alternative.

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**S.4.10 Travel Management Plan**

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**Summary**

The BLM needs to stop work on the RMP/EIS until they’ve developed a TMP. The BLM needs to explain the differences between the planning allocations and the actions considered in a TMP. As it is written now, the RMP is confusing and unclear in the differences. The BLM should include a Travel Management Plan to help differentiate between them and demonstrate to the public what the extent of the restrictions would be when new allocations are “Limited to Designated.” A TMP would also help maintain multiple, sustained use. The BLM has not met the requirements in Manual 1626 for clear criteria and constraints, planning sequence, public collaboration, and delineation of areas for future travel plans, which are all needed to develop a future TMP.

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**S.4.11 Lands and Realty – Land Tenure**

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**Range of Alternatives**

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**Summary**

Issue 1—Commenters provided several examples of areas that should be removed from disposal classification, including several individual parcels noted by legal description. In general, the following areas should be reconsidered:

- Lands in the Amargosa Valley identified for disposal could adversely affect water levels at Devils Hole and the Ash Meadows NWR.
- The 979.38 acres of land in the “Valley West Disposal Area” should be allocated for retention (removed from disposal classification), as they are closely connected to the Red Rock Canyon area.
- The Moapa-Glendale land disposal areas that fall within the Moapa Mesquite ACEC conflict with the intent of the ACEC, and these lands should be reclassified for retention.
- The BLM needs to clarify the classification of lands adjacent to and associated with the Tule Fossil Beds National Monument. The RMP should clearly state that the lands north of the Paiute Reservation are available for disposal.
- Lands allocated for disposal in the Moapa-Glendale area and Bunkerville-Mesquite area are in conflict with SSS-10 action in the alternatives.
- Lands in the Pahrump Valley should not be allocated for disposal, as this could negatively affect the Pahrump Valley buckwheat.
- The BLM should remove the action allowing conveyance of lands if they meet the same general criteria as those already identified for disposal, as it greatly expands the potential land disposal actions. If not removed, it should be revised to include a requirement for exchange.
- The BLM should clarify that lands formerly within the CTA are now available for disposal and development in accordance with SNPLMA.

Issue 2—Some commenters suggested the BLM consider acquiring the Anniversary Mine Property or an easement to assure continued public access to the area.

Issue 3—Commenters suggested the BLM reconsider the criteria for conveyance to include an emphasis on protecting cultural resources and locations considered sensitive by tribes.

Issue 4—Maps illustrating the disposal areas are too small a scale to adequately illustrate the areas available and unavailable for disposal.

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### ***Best Available Information Baseline Data***

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### ***Summary***

Commenters suggested several areas that the BLM needs to clarify in the description of current management and affected environment, including:

- The BLM needs to clarify how the 86.5 acres within the disposal area adjacent to Reid Gardner Generating Station are slated for direct sale to the power station.
- The BLM needs to clarify precisely how many acres have been conveyed and under what authorities.

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## ***Impact Analysis***

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### ***Summary***

The BLM needs to expand, clarify, or develop new analysis for the impacts associated with conveying land. Areas that need to be further discussed include:

- Conveyance in the SNPLMA disposal area, as the DEIS does not consider the new infrastructure required for development should these lands be used for development
- Impacts on the water quality and quantity should lands be conveyed in the Amargosa Basin and what effect conveyance would have on water rights
- Lands that have and haven't been conveyed under the No Action Alternative, as the current analysis is assuming all the lands have been conveyed, which does not represent an accurate description of current conditions
- Documentation to support the BLM's conclusions that land disposals result in impacts on water quality
- The effects on cultural resources, as the BLM has only generally stated that there would be effects from land tenure changes, but fails to flesh out what those impacts would actually be
- An expansion on the impacts from land tenure adjustments on the city of Laughlin, as this is not discussed in the Draft RMP/EIS.

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## ***Cumulative Impacts***

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### ***Summary***

The RMP needs to analyze the cumulative effects of continued removal of lands from multiple use through disposal.

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## **S.4.12 Lands and Realty – Land Use Authorizations**

### ***Range of Alternatives***

1  
2 *Summary*

3 Commenters suggested that the BLM consider the following changes in the range  
4 of alternatives:

- 5 • Exclude areas that overlap with the tortoise recovery network from  
6 large-scale land use authorizations
- 7 • Include the specific language provided by the Nevada Test and  
8 Training Range: “The US. Air Force has identified areas around Nellis  
9 AFB and the Nevada Test & Training Range where development  
10 could adversely impact its ability to meet national defense objectives.  
11 The High Risk of Adverse Impact Zone map depicts areas of military  
12 concern. Proponents should contact Nellis AFB as early as possible to  
13 ensure proposed development is compatible or mitigated.”

14  
15 *Best Available Information Baseline Data*

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16  
17 *Summary*

18 The BLM should update the affected environment information to include:

- 19 • Reference to OPD’s existing and proposed ROWs
- 20 • The existing Virgin Valley Water District infrastructure and ROWs

21  
22 *Impact Analysis*

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23  
24 *Summary*

25 The BLM needs to account for the impacts on DCP-funded conservation  
26 developments in the analysis of land use authorizations, such as the purchase of  
27 grazing allotments, vegetation restoration areas, weed treatment areas, and road  
28 closures and monitoring.

29 Further, the BLM needs to analyze how varying widths of corridors would  
30 accommodate different uses and the effects of combining uses in these areas.

31  
32 *Cumulative Impacts*

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33  
34 *Summary*

35 In the Proposed RMP/Final EIS, cumulative impacts should be addressed in  
36 relation to each other. For example, the Proposed RMP/Final EIS should discuss

1                   permitting renewable energy projects that then lead to the need for ROW grants to  
2                   construct, maintain, and decommission associated transmission lines/corridors.

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#### 4                   **S.4.13 Lands and Realty – Transmission and Utility Corridors**

##### 5                   ***Range of Alternatives***

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##### 7                   ***Summary***

8                   Commenters were concerned with the corridors locations and widths analyzed in  
9                   the range of alternatives. Some commenters stated that the EIS provided  
10                  inadequate rationale for designating corridors and requested the EIS provide  
11                  assessments for the demand of utility corridors being designated in the EIS and  
12                  identify coordination with agencies in the development of utility corridors. Others  
13                  stated that consideration for corridors should be given to those areas already served  
14                  by existing utility facilities, such as those near Highway 95 and Highway 160.  
15                  Commenters requested the BLM work with stakeholders to identify additional  
16                  corridors for energy development and that the RMP consider and provide for utility  
17                  and transportation corridors other than energy corridors. Commenters also  
18                  provided specific locations where additional utility corridors should be included in  
19                  the alternatives, including:

- 20                               • The area between Pahrump and the Eldorado Valley, specifically near  
21                               Highway 160
- 22                               • The area northwest of Las Vegas along the Highway 95 corridor, to  
23                               the Junction of Highway 160
- 24                               • From north of Las Vegas, generally near Highway 95, rounding  
25                               around the east side of Las Vegas through Henderson and on to the  
26                               Eldorado Valley
- 27                               • The area between Pahrump and Amargosa Valley in Nye County
- 28                               • Harry Allen substation to the WWEC
- 29                               • North Las Vegas Valley Overview

30                  Commenters also requested changes to corridors in the alternatives, including:

- 31                               • Disposal of the utility corridor along US 95 north of the Paiute  
32                               Reservation to Lee Canyon Road
- 33                               • Moccasin Corridor
- 34                               • WWEC and SNDO corridors

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##### 36                  ***Best Available Information Baseline Data***

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1 *Summary*

2 One commenter requested clarification of the 2,640-foot-wide transportation and  
3 utilities corridor between the Ivanpah Airport, the Las Vegas Valley, and the I-15  
4 corridor.

---

6 ***Impact Analysis***

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8 *Summary*

9 Commenters were concerned that the EIS lacks required environmental analysis of  
10 impacts from the proposed corridors according to DOI and BLM policy, and the  
11 Regional Mitigation Strategy for Transmission. In addition, the Proposed  
12 RMP/Final EIS should clarify which type of project the BLM considers small and  
13 localized as well as differentiate between the impacts of each ROW development.  
14 Commenters requested the EIS address additional impacts related to corridors,  
15 including:

- 16 • The multi-state impacts for corridors that cross state lines
- 17 • Corridor impacts on WSAs
- 18 • Corridor impacts on specific grazing allotments
- 19 • Impacts from using Section 368 West-wide Energy corridors,  
20 corridors of concern, and the I-15 corridor
- 21 • Impacts on cultural resources
- 22 • Impacts on tribal lands from corridors
- 23 • Impacts on special status species

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25 ***Cumulative Impacts***

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27 *Summary*

28 One commenter requested the Proposed RMP/Final EIS include additional  
29 quantified cumulative impact analysis for all lands and resources traversed by a  
30 corridor. This analysis should include more GIS or other types of quantitative  
31 analysis.

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33 ***Mitigation Measures***

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35 *Summary*

Commenters stated that the BLM needs to provide adequate guidance for compensatory mitigation of unavoidable utility corridor impacts consistent with Sec. Order No. 3330 and BLM Regional Mitigation Policy, including “innovative construction techniques” and standard compensatory mitigation techniques or requirements for transmission lines. The Proposed RMP/Final EIS needs to be clarified to explain how individual mitigation for linear projects relates to regional mitigation strategies as per BLM policy. Commenters provided examples of mitigation strategies, including BMPs, revised IOPs, land acquisition, habitat restoration, protection of sensitive plant species, and refining variance areas.

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#### **S.4.14 Land and Realty – Renewable Energy**

##### ***Range of Alternatives***

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##### ***Summary***

Issue 1—Commenters requested that the BLM develop a consistent framework for identifying portions of the planning area where wind energy development would pose the fewest threats to wildlife and other resources. The RMP should prioritize wind energy development in low-conflict areas while avoiding or excluding development in other areas. The Proposed RMP/Final EIS should provide the rationale for designating areas as open, avoidance, or exclusion for wind energy ROWs.

Issue 2—Commenters recommended modifying the size and location of several solar energy zones and variance areas that were identified in the Solar PEIS. Multiple commenters specifically identified a need to expand SEZs and variance areas to include areas that have low potential for resource conflicts. Other commenters recommended excluding areas within existing SEZs and variance areas from future solar energy development due to potential resource conflicts. The primary conflicts commenters cited were:

- Groundwater resources
- Special status species
- Airports

Issue 3—Commenters requested that the Proposed RMP/Final EIS provide more detailed management for SEZs and include justification as to why the BLM included each SEZ in the range of alternatives. When designating SEZs, commenters suggested that the BLM use the Western Solar Plan, the process outlined in the Solar PEIS ROD, and a more robust public process. The BLM could also consider using an interim designation of ‘Solar Energy Study Area’ to evaluate potential resource conflicts before designating an SEZ. Management of SEZs should consider areas where solar energy projects have already been approved, but not developed.

1 Issue 4—Commenters stated that designating the Castle and New York Mountains  
2 adjacent to the Mojave National Preserve as open to wind energy ROWs would  
3 conflict with desert bighorn sheep habitat, existing eagle nesting sites, and cultural  
4 and visual resources. Commenters also noted potential wind energy development  
5 conflicts with bighorn sheep and desert tortoise in the McCullough and River  
6 Mountains. They recommend the EIS evaluate an alternative that would close these  
7 areas to wind energy development.

8 Issue 5—Commenters requested that acreages for exclusion, variance areas, and  
9 SEZs be made consistent throughout the Proposed RMP/Final EIS.

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10  
11 ***Best Available Information Baseline Data***

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12  
13 *Summary*

14 Issue 1—Commenters suggested that the BLM complete a new Reasonably  
15 Foreseeable Development Scenario for the planning area that more accurately  
16 reflects the demand for future solar energy development.

17 Issue 2—Commenters stated the BLM should not designate new SEZs until it  
18 completes comprehensive LWC inventories in compliance with BLM Manual  
19 6310.

20 Issue 3—Commenters recommend using The Nature Conservancy’s Mojave  
21 Ecoregional Assessment, the US Fish and Wildlife Service’s Wind Energy  
22 Guidelines, and the BLM’s Mojave Basin and Range Ecoregional Assessment to  
23 identify areas where solar energy development would have the least potential for  
24 environmental impacts.

25 Issue 4—Commenters requested the BLM use the most accurate baseline data  
26 consistently throughout the RMP/EIS document. In particular, commenters noted  
27 discrepancies and inaccuracies in how the Draft RMP/EIS describes the number of  
28 homes able to be powered by one MW of energy and the energy demand  
29 assumptions for meeting renewable energy portfolio standards in multiple states.

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30  
31 ***Impact Analysis***

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32  
33 *Summary*

34 Commenters stated that the Draft RMP/EIS does not adequately analyze impacts  
35 from potential development in the SEZs. The analysis should be completed in a  
36 manner that allows NEPA analysis for future energy projects within the SEZ.



1 ***Cumulative Impacts***

2  
3 ***Summary***

4 Commenters requested that the analysis consider the potential cumulative impacts  
5 resulting from the implementation of existing programmatic energy EIS  
6 documents.

7  
8 ***Mitigation Measures***

9  
10 ***Summary***

11 Issue 1—Commenters requested that the BLM develop regional mitigation plans  
12 or strategies for the proposed new SEZs.

13 Issue 2—Commenters requested that **Appendix B.2** - Best Management Practices  
14 for Reducing Visual Impacts of Renewable Energy Facilities, be revised to include  
15 siting and design standards that relocate turbines away from national parks to  
16 minimize impacts on visual resources.

17  
18 **S.4.15 Areas of Critical Environmental Concern**

19  
20 ***Summary***

21 Issue 1—Commenters questioned the BLM’s coordination with stakeholders and  
22 compliance with NEPA while identifying ACECs. Also, commenters questioned  
23 the level of detail necessary to ascertain whether the BLM adhered to the required  
24 decision process for reviewing and accepting ACEC proposals. Specific areas were  
25 noted by commenters which were opined to not being adequately supported  
26 between the areas nominated and those where were carried forward in the  
27 alternatives (e.g., Mesa Milkvetch, Big Dune, and Stewart Valley).

28 Issue 2—Commenters requested that the BLM provide the criteria used to evaluate  
29 relevance and importance for the ACEC proposals submitted to the BLM, so all  
30 stakeholders can evaluate the areas' resource values.

31  
32 ***Range of Alternatives***

33  
34 ***Summary***

35 Issue 1—Commenters requested specific boundaries of ACECs should be  
36 modified for various reasons, such as:

- Overlapping acreage of SRMAs
- Overlapping acreage of areas proposed for land disposal
- Allowance of site-type and linear land use authorizations
- Protection of critical habitat for special status species

Issue 2—Commenters requested that general allowances be included in the ACEC management actions. Commenters also provided suggested additional management prescriptions for ACECs, such as:

- Reclamation of temporary roads
- Collection of sensitive invertebrate species allowed only on a case-by-case basis through a BLM permit
- Closure of fluid mineral leasing
- Exclusion of renewable energy development
- Prohibition of speed events
- Implementation of protection
- Conservation
- Mitigation
- Recovery actions dealing with management of the ACEC
- Fire management actions

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### ***Best Available Information Baseline Data***

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#### ***Summary***

Issue 1—Commenters provided examples of new information that has become available since the ACEC evaluations were completed, and requested that the BLM review these information sources. The commenters opined that this information supports the relevance and importance criteria of areas previously nominated as ACECs. New information sources are as follows:

- Averill-Murray, R. C., C. R. Darst, N. Strout, and M. Wong. 2013. Conserving Population Linkages for the Mojave Desert Tortoise (*Gopherus agassizii*) Herpetological Conservation and Biology 8:1
- Bureau of Land Management. 2014. Interim Policy, Draft - Regional Mitigation Manual Section - 1794
- Comer, P., P. Crist, M. Reid, J. Hak, H. Hamilton, D. Braun, G. Kittel, I. Varley, B. Unnasch, S. Auer, M. Creutzburg, D. Theobald, and L.

1 Kutner. 2013. Mojave Basin and Range Rapid Ecological Assessment  
2 Report

- 3 • Hagerty, B. E., K. E. Nussear, T. C. Esque, and C. R. Tracy. 2010.  
4 Making molehills out of mountains: landscape genetics of the Mojave  
5 Desert tortoise. *Landscape Ecology* 26:267-280
- 6 • US Fish and Wildlife Service. 2011. Revised Recovery Plan for the  
7 Mojave Population of the Desert Tortoise (*Gopherus agassizii*)

8 Issue 2—A commenter opined that the BLM is not complying with numerous  
9 wilderness acts by designating certain areas as ACECs due to their adjacency to  
10 wilderness areas and because of flawed analysis and incomplete information. The  
11 commenter requested that these proposed ACECs be removed from all alternatives.

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12  
13 ***Impact Analysis***

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14  
15 ***Summary***

16 Issue 1—Commenters were concerned that the qualitative intensity scale provided  
17 in **Section 4.4.1.3** of the Draft RMP/EIS was not adequately or consistently  
18 addressed in the analysis of impacts on ACECs. Also, commenters opined that the  
19 specific relevance and importance impacts need to be defined in the analysis (e.g.,  
20 Renewable Energy Impacts on ACECs).

21 Issue 2—A local governmental agency suggested that the Pahrump Buckwheat  
22 should not be included as a relevance and importance value under any alternative  
23 due to additional baseline information indicating that the populations of this  
24 species are present in all areas of survey and collections with no decline or  
25 extirpation have been observed. Also, the commenter opined that impacts of  
26 disposal on this species are localized and would not impact the species as a whole.

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27  
28 ***Cumulative Impacts***

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29  
30 ***Summary***

31 Commenters were concerned with how new ACEC designations will cumulatively  
32 impact OHV recreational opportunities in specific areas and suggested these  
33 impacts be further analyzed (e.g., Muddy Mountains, Logandale, and Jean Lake).

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34  
35 ***Mitigation Measures***

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36  
37 ***Summary***

Commenters from local governmental entities and environmental organizations opined that the Proposed RMP/Final EIS should include a comprehensive regional mitigation strategy and/or plan that covers the entire planning area that provides adequate guidance for how such strategies will be developed. Also, within this plan the size and location of where mitigation will be completed should be specified.

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#### **S.4.16 WSRs**

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##### *Summary*

Issue 1—Commenters questioned the baseline information for determining reaches along the Meadow Valley Wash regarding classification as scenic, and they questioned suitability for WSR designation due to conspicuous roads and the railroad paralleling the river.

Issue 2—Commenters suggested that the Classification Table from Illustration 2 of BLM Manual 6400 should be included in the Proposed RMP/Final EIS. Also, BLM Manual 6400 should be referenced throughout the Proposed RMP/Final EIS, which replaced BLM Manual 8351 in 2012.

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#### **S.4.17 WSAs**

##### *Range of Alternatives*

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##### *Summary*

An environmental organization suggested that not offering the alternative of closed to all motorized or mechanized vehicles for WSAs is not in the best interest of managing these areas to meet the non-impairment standards.

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#### **S.4.18 Wilderness**

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##### *Summary*

Issue 1—A federal governmental agency requested that adjacent wilderness areas across the Nevada and California border be identified and described in the affected environment section (e.g., Mojave National Preserve).

Issue 2—A commenter opined that the BLM is not complying with numerous wilderness acts by designating certain areas as ACECs due to their adjacency to wilderness areas and because of flawed analysis and incomplete information. The commenter requested that these proposed ACECs be removed from all alternatives.

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## **S.5 SOCIOECONOMIC CONSIDERATIONS**

### **S.5.1 Social and Economic**

#### ***Best Available Information Baseline Data***

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##### *Summary*

Issue 1—Commenters requested that specific income sources and baseline data be further analyzed and described in the Socioeconomics discussion of the Proposed RMP/Final EIS with all supporting citations referenced in the references list (e.g., The Mint 400, payment in lieu of taxes, Expenditures of Local Day Use Visitors to BLM Lands, and unincorporated communities in Clark County).

Issue 2—A local governmental entity suggested the Socioeconomic Baseline Report and the Proposed RMP/Final EIS should be updated and revised to include population projections through the projected time frame of 2030, during which this RMP would be in effect. This commenter also suggested the BLM use data from local sources which are available on county websites as well as from the Nevada Governor's Office of Economic Development.

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#### ***Impact Analysis***

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##### *Summary*

The BLM fails to disclose/include/evaluate/identify/consider/quantify the socioeconomic impact(s) of local and regional economies due to:

- The lack of a qualitative intensity scale for impact analysis
- Not carrying forward nominated ACECs
- Using special designations to remove lands from multiple use
- Access to and regulation of water resources
- A loss or reduction in AUMs for livestock grazing
- Mandatory vegetative restoration
- ROW and renewable energy exclusion and avoidance areas proposed in the Draft RMP/EIS

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#### ***Cumulative Impacts***

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##### *Summary*

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1 Commenters requested that the socioeconomic cumulative impacts on tourism  
2 should be further analyzed and described regarding the reduction of OHV use  
3 under Alternative 3.

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## 4 **S.5.2 Public Safety and Hazardous Materials**

### 5 ***Best Available Information Baseline Data***

#### 6 *Summary*

7  
8 Commenters provided additional baseline information and suggested specific areas  
9 to be considered further regarding public health and safety concerns (e.g., mine  
10 hazards in the Blue Diamond area).  
11

---

### 12 ***Impacts Analysis***

#### 13 *Summary*

14  
15 Commenters requested the impacts on public health and safety caused by target  
16 shooting in specific areas should be further analyzed and incorporated into the  
17 Proposed RMP/Final EIS (e.g., lands adjacent to reservations).  
18

---

## 19 **S.5.3 Tribal Interests**

### 20 ***G2G Consultation***

#### 21 *Summary*

22  
23 Issue 1—A tribal government requested the re-initiation of government-to-  
24 government consultation with the BLM and the Las Vegas Field Office regarding  
25 the RMP/EIS due to new members in the tribe's governing business council and  
26 provided contact information for points of contact to reengage with the BLM as a  
27 cooperating agency.  
28

29 Issue 2—An environmental organization suggested the BLM further consult with  
30 tribes who are connected to the designated Spirit Mountain Traditional Lifeway  
31 Area to plan accordingly for the protection of this area.

---

### 32 ***Cumulative Impacts***

#### 33 *Summary*

1 A tribal government opined that the analysis fails to consider cumulative impacts  
2 on tribal interests and underrepresents impacts from specific activities. It requested  
3 to meet with the BLM for further consultation regarding impacts on tribal entities.

---

4

5